

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Wilzaylan Brito Solis,

D. Minn. Case No. 0:23-mc-\_\_\_\_\_

Plaintiff,

M.D. Fla. Case No.  
No. 5:23-cv-000208-JSM-PRL

v.

American Express National Bank; et al.;

Defendants.

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**DEFENDANT TD BANK USA, N.A., AND  
NONPARTY TARGET ENTERPRISE SERVICES, INC.'S  
MOTION TO QUASH SUBPOENAS**

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Defendant TD Bank USA, N.A., and its nonparty credit-card servicer  
Target Enterprise Services, Inc., respectfully move this Court under Rule 45(d)(3)  
for an order quashing Mr. Solis's subpoenas to Target.

October 10, 2023.

BARNES & THORNBURG LLP

/s/ Brian Melendez

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